YUASA BATTERY, INC.
LAURELDALE, PA

SPILL PREVENTION/CONTROL PLAN

ISSUE DATE: April 2005
REVISION DATE: September 2009

YUASA BATTERY, INC.
2901 Montrose Ave
Laureldale, PA 19605
EPA ID # PAD095361655

SPILL PREVENTION/CONTROL PLAN

TABLE OF CONTENTS

SPILL PREVENTION/CONTROL PLAN
for
YUASA BATTERY, INC.

RECORD OF CHANGES

Revision	CHANGE DESCRIPTION	DATE ENTERED	POSTED BY
1		JANUARY 10, 1998	ALEX BANIAS
2		JANUARY 4, 1999	RICHARD BALDAUF
3		APRIL 19, 2001	JED WERNER
4		OCTOBER 16, 2002	JED WERNER
5	New Plan (EF-006-001)	APRIL 1, 2005	JED WERNER
6	update operation descriptions	OCTOBER 1,2005	JED WERNER
7	update emergency contacts	JANUARY 25, 2007	ROBIN DAUB
8	update plan	JANUARY 27, 2009	ROBIN DAUB
9	update Appendix F & Initial Emergency Contacts	SEPTEMBER 23, 2009	ROBIN DAUB

SPILL PREVENTION/CONTROL PLAN

I. Original Date of Plan: January 1995

II. Purpose

A. To comply with the requirements set forth in the EPA amended General Pretreatment Regulation in response to the Domestic Sewage Study. These amendments were published in the Federal Register on July 24, 1990. (40 CFR Parts 122 and 403.)

B. To establish procedures for the prevention/control/containment of hazardous waste or hazardous materials upon notification or discharge within the physical boundaries of Yuasa Battery's Laureldale facility.

C. Establish cleanup, disposal and restoration actions in the event of an actual spill or discharge at the facility.

This plan will be reviewed annually. It will be updated as needed or as changes occur in processing, materials used, etc. All locations receiving copies of this plan will receive any changes or updated copies.

IV. Location of Plan

Complete copies of this plan will be maintained at:

- Vice President of Operations
- Environmental Manager's Office
- Plant Engineer's Office
- Wastewater Treatment Plant
- Distribution Center Manager's Office
- Maintenance Supervisor Office
- And the following locations outside the plant:

1. **City of Reading**
Dept. of Public Works
815 Washington Street
Reading, PA 19601
Attn: Pretreatment Coordinator
610-655-6073

2. **Pennsylvania DEP**
1005 Cross Roads Blvd
Reading, PA 19605-9778
Attn: Office of Pollution Prevention
610-916-0100

3. **Elk Env. Services**
225 Warren Street
Reading, PA. 19601
610-372-4760

4. **Chief Mark George**
Temple Fire Co.
PO Box 217
Temple, PA 19560
610-929-8050

5. **Berks County Emergency Management Agency**
PO Box 520
Leesport, PA 19605

6. **Fire Chief**
David Feltenberger
Central Fire Company
Laureldale, PA 19605
610-929-9833

7. **Chief of Police**
Laureldale Police
3406 Kutztown Road
Laureldale, PA 19605
610-929-8816

8. **Chief Brian Kissinger**
Goodwill Fire Company
100 Madison Ave.
Reading, PA 19605
610-921-3393

V. Initial Emergency Contacts (YUASA)

TITLE	NAME	HOME PHONE CELL PHONE
FACILITY EMERGENCY COORDINATOR	ROBIN DAUB	610-374-7228 610-301-5240
VICE PRESIDENT OF OPERATIONS	MIKE RAYBUCK	717-445-5322 717-368-3368
PLANT ENGINEERING MANAGER	JEFF ERMOLD	610-944-1444

VI. General Description of Industrial/ Commercial Activity

Yuasa Battery's facility in Laureldale, PA is engaged in the manufacture and distribution of lead-acid storage batteries (NAICS 335). Acidic industrial wastewater from various plant production processes is collected and transferred to an on-site acid brick lined sump. The industrial wastewater is treated through the on site industrial wastewater treatment plant, and discharged to the City of Reading wastewater treatment plant (Industrial Wastewater Discharge Permit #35F). Solids collected in the Yuasa Battery, Inc. wastewater treatment plant are transported by contractors as listed on appendix F.

VII. Number of Employees

Yuasa Battery has a total of 194 employees at the Laureldale, PA facility.

Day: 70 Plant Mid: 35 Plant Night: 29 Plant
Salaried: 45
DC: 15

VIII. Hours of Operation

Department operations occur on all three shifts, with some departments only work 2 shifts per day. The office staff's (approximately 31 people) normal hours are from 7:00 a.m. to 5:00 p.m. The remaining production shift starting times are staggered throughout the plant and are as follows:

1st shift begins between 5:00 a.m. and 5:50 a.m.
2nd shift begins between 1:00 p.m. and 1:50 p.m.
3rd shift begins between 9:00 p.m. and 9:50 p.m.

IX. Daily Discharge Rates

About 35,000 – 45,000 gallons per day are discharged to the sewer system through the industrial wastewater treatment plant. The rate varies depending on the shifts/departments in operation. The discharge to the sewer consists of toilet and urinal water, as well as a sink in the handicap bathroom.

Yuasa Battery's Permit 35F with the City of Reading P.O.T.W. calls for quarterly monitoring of total metals, PH, and oil grease in the system.

Locations of all restroom drains that discharge to the sewer systems are detailed in Appendix B of this plan.

Waste sulfuric acid from various plant manufacturing operations is collected in an acid brick lined sump and treated in the on site industrial wastewater treatment plant. The wastewater treatment plant floor drains go back to the primary collection sump so the probability of spills is minor.

The storm water system is shown in Appendix C.

X. Security

All visitors to the Yuasa Battery facility are required to register prior to entry by signing a visitor sheet at the main entrance to the plant on Montrose Avenue. Appendix C illustrates the entry points to the facility.

External factors, such as power outages and strikes, will not result in adverse effects to human health or the environment as production processes and associated waste generation processes will cease. Adequate storage facilities for hazardous materials and wastes have been incorporated into facility design so as to allow short-term storage of such materials. Yuasa Battery provides its own internal security 24 hours a day.

Other external factors, such as floods and snowstorms, are not expected to produce adverse effects on public health and safety or the environment.

A topographic map (Appendix A) will illustrate other water supplies and structures in the general area of the facility.

XI. Inspection and Monitoring Program

Elements of the Yuasa Battery Hazardous waste facility inspection requirements are outlined below.

A. A RCRA 90-day facility Inspection Log shall be maintained for each hazardous waste storage area.

B. The frequency of inspection is as follows:
Hazardous waste containers storage areas: at least one inspection per week of areas where containers are stored, looking for leaking containers and the containment system caused by corrosion or other factors. The two locations are in the grid casting warehouse and a roll- off dumpster located behind the plant. There are satellite collection locations inside the plant to collect the hazardous waste.

XII. Employee Training Program

A. Indoctrination to Company Environmental policy

At the beginning of his/her employment, each employee is introduced to the Company's Environmental policy through the audio-visual presentation(s) and pamphlets. This indoctrination conducted by the environmental manager can be individualized or in small group instructions.

Each employee must understand the following concepts if he is to begin his work experience safely:

1. All aspects of Yuasa's Environmental Policy related to his or her position.

2. Plant management is committed to preventing accidents and reducing releases to the environment.
3. Each employee is expected to report to his supervisor any upset or noncompliance situations, which he encounters in his work.

B. Department Indoctrination and Training: When a new employee reaches his own department, his supervisor is responsible to give him additional safety training pertaining to the operation the employee is assigned, as well as complete instruction on his operation. The supervisor or foreman will explain the general safety rules of the department, machinery, or tool regulations, and personal protective equipment requirements.

Job instruction should be given in three parts:

1. Explain the job
2. Observe the worker on the job
3. Correct improper or unsafe work practices

The job explanation should include how to do the work both efficiently and safely. The supervisor or leader should then observe the new worker on his first day to insure the job is conducted properly. If corrections are needed, they should be demonstrated to the worker immediately so the improper behavior does not become habit.

A follow up of the worker's performance should be done by the supervisor within one week of the worker's start in the department to insure that the job is being carried out properly. The supervisor as well as all plant management must continually observe all employee practices to correct improper methods or unsafe acts before an accident occurs.

C. Introduction of new equipment and the training of employees

Whenever new equipment is added to the plant or changes in operation of present equipment occur, retraining of the workers is necessary. Plant management, including the Environmental, Health, and Safety manager, should be thoroughly familiar with the new process and plan the retraining of the employees and, if necessary, department supervision. No machinery shall be used unless all safety equipment is properly installed and all required ventilation is operable. Changes in existing machinery, which defeat safety or health protection devices, are also not to be permitted.

Training should begin with a brief introduction of the equipment or process. Special emphasis should be placed on procedures, which differ from present ones. All steps should be explained clearly. The instructor (plant supervisors or Environmental, Health, and Safety manager) should remember that his audience might not be as familiar as he is with the new process. Next, the workers operate the machinery or adopt the new procedure while under constant supervision. Any steps conducted improperly or unsafely should be corrected. Finally, plant

supervision should periodically evaluate the new process and make any changes necessary to improve safety and performance. When giving instructions, one-word descriptions promote better comprehension as in "drop" or "burn." Demonstrating procedural steps as well as describing them in a word or two will help workers remember the sequence to follow (i.e., stack and burn.) Accidents occur when normal routine changes or a person is assigned to at new, especially a one-time, job. Plant management or department supervision should clearly explain and provide all the instruction necessary to complete this type of job safely.

XIII. Material Inventory

Potentially hazardous materials, their containers, and how they are stored are detailed in Appendix E. Lists of these materials with the proper Material Safety Data Sheets (MSDS) are located in each department with the Supervisor. Each department has a listing specific to that department. A "Right to Know" station is located at the main entrance to the plant and the departments. These lists are readily available to the employees through their Supervisor. A plant wide listing of the MSDS sheets is available with the EHS Department.

XIV. Hazardous Waste Inventory

An inventory of hazardous wastes generated at the Yuasa Battery, Laureldale, PA facility is presented in Appendix F. The inventory also includes the name of an approved facility to treat, store, or dispose of the waste, plus applicable U.S. Environmental Protection Agency (EPA) and U.S. Department of Transportation (DOT) shipping requirements.

XV. Plant Implementation in the Event of a Spill

In the event of a spill, the plant Emergency Coordinator is to be contacted immediately. If the spill occurs during non-routine hours, the appropriate plant management personnel shall be contacted using the emergency phone list (Appendix G)

A. Duties/Responsibilities of the Emergency Coordinator

The emergency coordinator upon notification will:

1. Assess the situation. Determine what level of response is necessary.

2. Direct resources to contain the spill.

3. Be thoroughly familiar with all aspects of the facility, this spill plan, the Potential Hazard Guides, all operations and activities at the facility, including characteristics of hazardous materials and waste handled.

4. The Company has authorized the emergency coordinator to commit the resources needed to carry out this spill plan. The company has an open purchase order on file with each primary spill cleanup company listed in order to carry out spill cleanup immediately.

5. Once the Emergency Coordinator is on-scene, he will brief the fire/hazardous materials team representative(s) on the hazard sources, amount, and facility layout including electrical panels and voltage inputs and/or outputs.

6. Whenever there has been an emission or discharge, fire, or explosion, the emergency coordinator shall assess possible hazards to human health or the environment that may have resulted. This assessment shall consider both direct and indirect effects on the emission, discharge, fire or explosion.

7. If the emergency coordinator determines that the facility has had an emission, discharge, fire or explosion, which could threaten human health or the environment, he shall accomplish the following:

   a. Immediately notify appropriate local authorities of his assessment. Assist appropriate officials in reaching a decision whether local area(s) should be evacuated.

   b. Immediately notify DEP by telephone.

8. Maintain an event log of actions taken during the incident.

9. Direct cleanup operations.

10. Insure restoration of environment to original condition.

11. If spill flows off-site, continue to assist local agencies in containment and cleanup.

NOTE: Emergency Response Procedures for specific situations are detailed in Appendix H.

B. Duties/Responsibilities of Outside Fire Department

Upon notification will:

1. Immediately respond to an actual or potential hazardous substance spill in accordance with established procedures.

2. Assist operations at the spill location with the assistance of the emergency coordinator.

3. Follow Emergency Response Guidebook (from DOT.)

4. If the facility stops operations in response to a fire, explosion, emission or discharge, the Incident Commander (or his representative) shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment.

C. Duties/Responsibilities of Local Police Department

Upon notification will:

1. Immediately respond to the hazardous substance spill area and isolate the area and control vehicle traffic when and where necessary in coordination with the Fire Department.

2. Keep all non-essential personnel and equipment out of the spill area.

3. Establish a security perimeter around the spill site.

D. Duties/Responsibilities of Yuasa Battery Inc.'s Vice President of Operations

Upon notification will:

1. Respond to all hazardous substance spills when requested by the emergency coordinator.

2. Keep abreast of all actions during a spill, fire, and/or explosion to provide prompt and accurate information on the nature of the incident and the steps being taken to correct the problem. This policy must be followed to obtain understanding of the public's concern and to ensure cooperation from all interested parties/agencies, as well as to check the spread of misinformation.

3. Clear all news releases involving the actions taking place with the President or his designated representative.

E. Duties / Responsibilities of Yuasa Battery Inc.'s Maintenance Supervisor:

1. Supervise building utility and production equipment shut-down as required.

2. Coordinate the safe start-up of plant utility and production equipment.

XVI. Additional Assistance During Implementation of Spill Plan

A. In the event that a release cannot be contained or cleaned up by Yuasa personnel, Yuasa Battery has contract with Elk Environmental Services, Reading, PA to provide Emergency Response Assistance, if required.

B. Sample Collection Procedures
The procedures to be used are as follows:

1. Use one (1) pint size glass container or suitable alternate container.

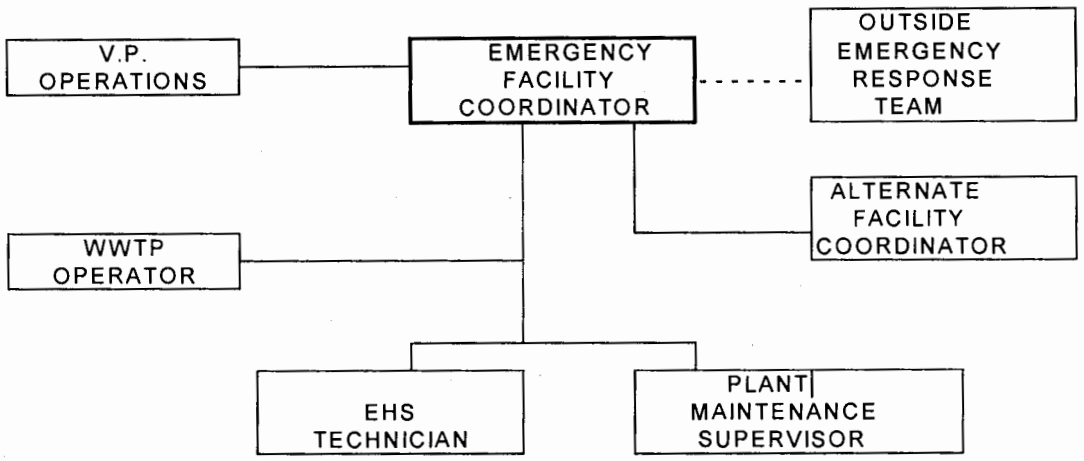
2. Use previously unused bottles or containers, which have been thoroughly cleaned with a strong detergent, thoroughly dried and rinsed.

3. Properly label samples to indicate location, time taken, and sequence of sampling.

4. Prepare a custody record stating the time and location of sample, name and title of individual taking the sample, and the name and title of each subsequent person handling the sample.

Note that plastic containers, with the exception of Teflon, have been found in some cases to absorb organic materials from water and in other cases hazardous substances have been found to dissolve plastic containers. Precautions must be taken to know the hazardous substances/wastes and their reaction on containers.

XVII. Chain of Command



XVIII. Emergency Contractor and Capability

Emergency Contractors	Capabilities
Primary Contractor:	
Elk Environmental Services 1420 Clarion Street Reading, PA 19601 EPA ID # PAD987271020 **TELE**: 610-372-4760	Spill Response Bulk Container

XIX. OUTSIDE EMERGENCY RESPONSE PHONE NUMBERS

ORGANIZATION	CONTACT/ LOCATION	PHONE NUMBER
FIRE DEPARTMENT	Central Fire Dept	**911**
AMBULANCE SERVICE	Muhlenberg	**911**
POLICE	Laureldale	(610)929-8816
EPA	Region 3	(215)814-9016
PADEP	Emergency Response	**1-800-975-9690**
PADEP	Reading District Office	(610)916-0100
PA. EMERGENCY MANAGEMENT AGENCY (PEMA)	Regional	(610)562-3003
LAURELDALE EMERGENCY MGMT COORDINATOR	Pat O'Brien	(610)929-4940 (Day) (610)921-9554 (Night)
HOSPITAL	Reading	(610)378-6000
MEDICL SERVICES	U.S. Healthworks	(610)926-0960
WASTEWATER TREATMENT PLANT	City of Reading	(610)655-6131 (day) (610)655-6300 (night)
DRINKING WATER	Muhlenberg Township Water Authority	(610)929-4709 (day) (610)929-2377 (night)
GPU ELECTRIC	Regional	1-800-545-7738 (24 hr)
HIGH VOLTAGE ELECTRIC SERVICE	Reuter &Hanney Warko	215-364-5333 610-796-4545
MG INDUSTRIES	N2 Gas Tank N2 Pipeline	1-800-641-4357 1-800-921-8608
POISON CONTROL	Berks County	1-800-722-7112

XX. Spill Alert and Prevention

Previous sections of this Spill Prevention Plan have dealt with procedures to be used in the event of a spill. Naturally, an even better course of action is to work toward preventing a spill at all.

Warning lights are present in two main locations. One is on the WWTP control panel. The warning light indicates that there is an out of spec. condition occurring in the WWTP. The other warning lights are located in the acid tower. The warning lights light up when there is either a leak or when there is an overfill of a tank. These warning lights light up light in the doorway on the southwest side of the acid tower in the Formation department. A manual alarm is located on each floor of the acid tower in the event of an emergency, which rings in the formation department.

Security Personnel provide security on 2nd and 3rd shift weekdays, and all shifts on weekends.

If an alarm does sound, or if security or other plant personnel detects a leak, notification can be made to plant and office personnel through the plant phone system. Actions will be taken from Appendix H. If an incident occurs during off duty hours, appropriate plant management is to is notified according the list identified in Appendix G. Evacuation from the plant can be made through the fire evacuation routes illustrated in Appendix D. If evacuation is deemed necessary, personnel are to move to the designated areas on the fire evacuation map. They are not to re-enter the plant until notified. In the event the facility is closed due to a spill, notification of return to work will be announced over local radio broadcast stations.

Spill supplies are located in the plant oil room next to the sulfuric acid/caustic soda delivery point. There is an inventory of hazardous spill pads, pillows and booms. There are also oil-only spill pads stored in the oil room. There are three hazardous material spill stations located throughout the plant.

Location of spill stations: (Refer to Appendix F - Hazardous Waste Locations Drawing)

1.) Truck Driver entrance to D.C. next to dock 1.
2.) Paste Mixing.
3.) WWTP, under stairs to proceed to the top of the tanks.

XXI. Spill Incident History

The completed reports (copies) submitted following implementation of this Spill Plan shall be maintained on file at the facility and will become part of the facility's spill incident history.

A complete report will be issued to the City of Reading, Bureau of Wastewater Treatment within five (5) working days, along with any applicable photographs. The report is also to address precautions to be implemented to prevent a recurrence of the spill.

XXII. Certification

Based on my inquiry of the person(s) directly responsible for managing compliance with the measures in this Spill Prevention Plan, I certify that, to the best of my knowledge and belief, this facility is implementing this Spill Prevention Plan submitted to the City of Reading, Bureau of Wastewater Treatment.

_____
Signature

Mike Raybuck / Vice President - Operations — October 6, 2009
Name / Title — Date

I certify that the spill prevention and control equipment and procedures in place at this facility will provide adequate protection from spills when used and properly maintained.

_____
Signature

Robin S. Daub/Environmental, Health & Safety Manager — October 6, 2009
Name / Title of Authorized Representative Responsible for this Plan — Date

Appendix A

Topographic Map of Facility

Appendix B

Sanitary Sewer Discharge Points

Appendix C

1. Shutoffs
2. Storm Water Sewer Locations
3. Entry Points to Building

Appendix D

Emergency Evacuation Routes

Appendix E

Plant Locations for Large Quantity Hazardous Chemicals

PLANT LOCATION FOR LARGE VOLUME HAZARDOUS CHEMICALS

CHEMICAL	LOCATION	VOLUME	UN#	SOLID/LIQ/GAS
Acetylene	M	3 cylinders	1001	compr. Gas
Nitrogen (L)	F	11,000 gal	1977	liquid
Nitrogen (G)	M	3 cylinders	1066	compr. Gas
Oxygen (L)	L	1,500 gal	1073	liquid
Oxygen (G)	M	3 cylinders	1072	compr. Gas
Propane	N	12 cylinders	1075	compr. Gas
Paint	G	50 gal	1263	liquid//aerosol
Mineral Oil	E,D	150 gal	9277	liquid
Cleaning Solvent	G,J	100 gal	1268	liquid
Sulfuric Acid	B,C,D,I,J	10,000 gal	2796	liquid
Lead (L)	A			liquid
Lead (S)	Entire Plant			solid
Lead Acid Battery	I,J	2,000 units	2796	solid/liquid
Lead Battery - Dry	G,J	1 million		solid/liquid
Sodium Hydroxide	K	50,000 lb	1824	liquid

APPENDIX F

1. Hazardous Waste Handlers
2. Hazardous Waste Inventory
3. Hazardous Waste Locations Drawing

HAZARDOUS WASTE HANDLERS

Robin Daub/Environmental, Health & Safety (EHS) Manager – Maintain and manage the hazardous waste program

Mark Richards/EHS& WWTP – (Volunteer Fireman) Assist with the maintenance of the hazardous waste program; assist with spill clean-up

Dan Miller/WWTP Operator – (Fire Chief of Blandon, PA) Conduct the weekly hazardous waste location inspections and maintain logs; conduct spill clean-up operations

Larry Allen/Material Handler – Daily maintenance of all hazardous waste locations (roll-offs, containers, hoppers; labeling/marking; prepare for shipping; loading)

Brian Werley/Assembly Back-up Material Handler - Back-up for material handler (above)

Ed Shaub/Formation Material Handler – Maintain container storage of formation hazardous waste

Yuasa Battery, Inc.
HAZARDOUS WASTE INVENTORY

Generator: Yuasa Battery, Inc.
EPA Identification Number: PAD095361655

Transporter: Elk Transportation, Inc.
EPA #: PAD987271020

SPENT MATERIAL -Lead Contaminated Debris, Pallets, and DTC Sludge

DOT Hazard Class: N.O.S. 9
Labels on containers/roll-off: NA3077, N.O.S. 9
EPA Hazardous Waste Number: D008
DOT Shipping Description: RQ, NA 3077, Hazardous Waste Solid, n.o.s., 9, III (Lead, D008)

TSDF: Max Environmental Technologies, Inc. (30 yard Rolloff)
Address: 233 Max Lane
Yukon, PA 15698
EPA ID#: PAD004835146

TSDF: Michigan Disposal Waste Treatment
Address: 49350 N. 1-94 Service Drive
Belleville, MI 48111
EPA ID#: MID00724831

Reference: Section 172.202, 172.203; Federal Register Vol. 45, No. 101, May 22, 1980 and Federal Register Vol. 45, No. 219.

SOLVENT RAGS

DOT Hazard Class: 4.1
Labels on containers: 4.1 Flammable Solid
EPA Hazardous Waste Number: D001, F003
DOT Shipping Description: RQ, UN1325, Waste Flammable Solids, Organic, n.o.s., 4.1, II (Toluene, Xylene, D001, F003)

TSDF: Giant Resource Recovery – Sumter, Inc.
Address: 755 Industrial Rd.
Sumter, SC 29150
EPA ID#: SCD036275626

Reference: Section 172.202, 172.203; Federal Register Vol. 45, No. 101, May 22, 1980 and Federal Register Vol. 45, No. 219, November 10, 1980, Yuasa Battery, Inc. Preparedness, Prevention and Contingency Plan.

FORMATION SEDIMENT

DOT Hazard Class: N.O.S. 9
Labels on containers: NA3077, N.O.S. 9
EPA Hazardous Waste Number: D008
DOT Shipping Description: RQ, NA 3077, Hazardous Waste Solid, n.o.s., 9, III (Lead, D008)

TSDF: EQ Detroit, Inc.
Address: 1923 Frederick St.
Detroit, MI 48211
EPA ID#: MID980991566

Reference: Section 172.202, 172.203; Federal Register Vol. 45, No. 101, May 22, 1980 and Federal Register Vol. 45, No. 219.

Current Packaging/Transport Vehicle: barrels, drums, roll-off (located on the east side of the building)

APPENDIX G

Facility Emergency Contact Phone List

EMERGENCY CONTACT LIST
(Electrical Power Failure, Equipment Failure, Weather, etc.)
Updated 03/06/09

In the event of one of the above, the following personnel **must be called**.

Robin Daub – Environmental, Health & Safety Manager	Home: Cell:	610-374-7228 610-301-5240
Keith Ordemann – President & CEO	Home: Cell:	610-777-0812 610-223-4751
Pat Hojnacki – Vice President of Finance & Administration	Home: Cell:	610-793-3355 610-716-2815
Mike Raybuck – Vice President of Operations	Home: Cell:	717-445-5322 717-368-3368
Jim Colflesh – Director of Purchasing	Home: Cell:	610-926-2931 484-797-0178
Karen Fell – Human Resources Manager	Home:	610-689-4548
Brian Guzanowski – Distribution Center Manager	Home: Cell:	610-796-2674 484-802-2005
Ray Harris – IT Contractor	Cell:	484-651-0591
Russ Reichert (Snow Removal – Sidewalks & building exits)	Home: Cell:	610-921-2701 610-698-2223
Scott Moyer – Down to Earth (Snow Removal - Parking Lots)	Home:	610-929-0913

In the event of a WASTEWATER TREATMENT PLANT EMERGENCY the following personnel must be called.

Dan Miller – Wastewater Treatment Operator	Cell: Home:	610-842-1396 610-926-4524 or 610-926-2811
Mark Richards – Backup Operator - Wastewater Treatment	Cell:	610-621-7689

In addition to the above list, it may be necessary to contact the following personnel:

Clay King – Quality Assurance Manager	Home:	610-939-9275

APPENDIX H

Emergency Response Procedures

Baghouse Fire
Acid/Caustic Unloading
Oxide Unloading
Diesel Fuel
Oil
Misc. Chemical Spill

Emergency Response Procedure for a fire in Baghouse #3

The Gridcasting baghouse #3 has an internal sprinkler system. If there are visible flames coming out of the baghouse stack and the sprinkler system has not been activated, ensure that the sprinkler system is turned on to the baghouse.

In the event of a fire and activation of the sprinkler system, the following steps need to be carried out.

1. Place (4) drain cover mats over the storm water drains next to baghouse #4. (Drain cover mats are stored in the oil room)
2. Lay hose in place and activate air diaphragm pump that collects water under the baghouse.
3. Do not turn off water to the sprinkler system when fire has been extinguished.
4. Pump water from storm drain covers into floor sump at Gridcasting chiller.
5. Collect all debris from inside collector in proper containers.

Notify Emergency Coordinator as soon as possible.

Emergency Response Procedure for spill of Sulfuric Acid or Sodium Hydroxide during unloading.

In the event of a spill during the unloading of sulfuric acid or sodium hydroxide all efforts are to be made to prevent the substance from entering the storm water collection basin, which is located north of baghouse # 2.

1. Any spilled product is to be cleaned up immediately using the pink absorbents product stored in the oil room.
2. The storm water drain covers are to be placed over the storm water grating if there is the possibility of product reaching it.
3. Absorbent pillows and socks are to be used to contain any spilled product to the smallest area of contamination possible.

Notify Emergency Coordinator as soon as possible.

Emergency Response Procedure for spill of Lead Oxide during unloading.

In the event of a spill of lead oxide all efforts are to be made to prevent the oxide from causing any further contamination

1. Small spills are to be cleaned up immediately using sweeping compound.
2. Large spills are to be contained to the smallest extent possible. Sweeping compound can be scattered over the oxide to prevent re-entrainment into the air, or plastic sheeting can be used to cover the oxide.
3. All material that is cleaned up is to be disposed of properly.

Contact Environmental Coordinator immediately when spill occurs.

Emergency Response Procedure for cleaning up Diesel fuel, hydraulic fluid or oil from tractor-trailers.

At the Distribution and manufacturing dock areas there are spill stations. These spill stations have absorbents to be used to prevent any fluids released from vehicles from mitigating offsite. All efforts are to be made to prevent fluids from entering storm water systems.

1. Contain the spill to the smallest area possible using absorbent materials.
2. Block off any storm water points from possible contamination.
3. Additional absorbent materials are available in the oil room. (White absorbents are oil only absorbents)
4. All material that is cleaned up is to be disposed of properly.

Contact Environmental Coordinator immediately when spill occurs.

Emergency Response clean up procedure for oil spills

Any oils that are spilled inside or outside the plant are to be cleaned up immediately.

1. Contain the spill to the smallest area possible using spill absorbent material.
2. Block off any storm water points from possible contamination.
3. Additional absorbent materials are available in the oil room. (White – oil only absorbents)
4. All material that is cleaned up is to be disposed of properly.

Emergency Response Procedures for clean up of Miscellaneous Chemical spills

Throughout the plant various chemicals are used in different departments. Spills can occur internally and externally of the plant. All spills are to be cleaned up immediately to lessen the impact to the environment.

1. Spills inside the plant are to be contained and cleaned up using absorbent materials or spill kits located throughout the plant. There are 2 universal spill kits in the plant; 1 in the D.C., and 1 in the hazardous waste room. There are 2 hazardous material spill kits; 1 in the wwtp, and 1 in paste mixing, and there are acid spill kits in the lab. A mercury spill kit is available in the Environmental office.

APPENDIX I

Notification to PA Department of Environmental Protection

NOTIFICATION TO: Pennsylvania Department of Environmental Protection (PaDEP)

1-888-975-9690: 24-hour emergency response number
1-800-541-2050: If unable to reach above number, call here.

SPILL INCIDENT CHECKLIST

1. Name of Informant: _____
2. Name, address, & Identification # of facility: _____
3. Telephone number where informant can be reached: _____
4. Date of spill: _____
5. Time spill occurred: _____
6. Location of spill: _____
7. Brief description of the incident, type, nature, & hazards to the environment: _____
8. Extent of injuries: _____
9. Shipping name of waste: _____
10. Hazard Class: _____
11. U.N. number of waste: _____
12. Estimated quantity involved: _____
13. Time of notification: _____

APPENDIX J

Spill Notification to National Response Center

NOTIFICATION TO: National Response Center
1-800-424-8802

SPILL INCIDENT CHECKLIST

1. Name of Informant: _____
2. Name, address, & Identification # of facility: _____
3. Telephone number where informant can be reached: _____
4. Date of spill: _____
5. Time spill occurred: _____
6. Location of spill: _____
7. Brief description of the incident, type, nature, & hazards to the environment: _____
8. Extent of injuries: _____
9. Shipping name of waste: _____
10. Hazard Class: _____
11. U.N. number of waste: _____
12. Estimated quantity involved: _____
13. Time of notification: _____

APPENDIX K

Spill Notification to the City of Reading POTW

NOTIFICATION TO: City of Reading, Bureau of Wastewater Treatment
(610) 655-6083

SPILL INCIDENT CHECKLIST

1. Name of Informant: _____
2. Name, address, & Identification # of facility: _____
3. Telephone number where informant can be reached: _____
4. Notification received by (P.O.T.W.): _____
5. Date of spill: _____
6. Location of spill: _____
7. Brief description of the incident, type, nature, & hazards to the environment: _____
8. Personnel safety concerns: _____
9. Extent of injuries: _____
10. Containment in place: _____
11. Current response efforts: _____
12. Hazard Class: _____
13. U.N./N.A. # of waste: _____
14. Estimated quantity involved: _____
15. Time of notification: _____

APPENDIX L

1. Log of Key Events of the Spill
2. Spill Response Report
3. Final Report Form for Spill

LOG OF KEY EVENTS OF THE SPILL

On site, in collection system, in community, and P.O.T.W., include the date, time, and action for each spill.

DATE OF SPILL: _____

TIME OF SPILL: _____

NOTIFICATION: _____

_____

_____

RESPONSE EFFORTS: _____

_____

_____

CONTROL EFFORTS: _____

_____

_____

CONTAINMENT TREATMENT EFFORTS: _____

_____

_____

DISPOSAL: _____

_____

_____

REMEDIAL ACTIONS: _____

_____

_____

SPILL RESPONSE REPORT

NATURE OF INCIDENT: Complaint Munic. Notification Emergency other

DATE: _____ TIME: _____ a.m. / p.m.
REC'D BY: _____

INCIDENT REPORTED BY: _____

TITLE/AFFIL. _____
PHONE: _____

ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____

INCIDENT LOCATION: Transportation Facility other

NAME (SITE): _____
PHONE: _____

ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____

COUNTY: _____
TWSP. /BORO: _____

DATE OF INCIDENT OCCURRENCE: _____
TIME: _____ a.m. / p.m.

RESPONSIBLE PARTY: ÿ Known ÿ Unknown ÿ Suspected

NAME: _____ PHONE: _____

ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____

Contact: _____ Title: _____
Phone: _____

IDENTITY OF SUBSTANCE RELEASED: Known Unknown Suspected

SUBSTANCE: _____ Gas Liquid Solid Hazardous

CAS # _____ UN # _____
DOT # _____

AMT. RELEASED/SPILLED: _____ lb / g / cu ft Actual Potential Undetermined

SUBSTANCE CONTAINED? Yes No Undetermined

CLEAN-UP CONTRACTOR: _____
PHONE: _____

TYPE OF RELEASE/SPILL: Terminated Continuous Intermittent

HAZARD EVALUATION: Fire Hazard Explosive Fumes Corrosive

PERSONNEL SAFETY CONCERNS

EXPOSURE:

_____
_____

STRUCTURAL DANGER:

_____
_____

COMMENTS:

_____
_____

INCIDENT DESCRIPTION:

Fire Explosion Air Release Spill Smoke/Dust

Odors Other _____

Equipment Start-up/Shutdown/Failure/Etc.
Other _____

INJURIES? Y N U PUBLIC EXPOSURE? Y N U

FACILITY EVALUATION? Y N U POLICE AT SCENE? Y N U

POTABLE WATER SOURCE? Y N U ASSISTANCE REQUESTED? Y N U

CONTAMINATION OF: AIR SOIL SURFACE WATER GROUND WATER

RECEIVING WATER: _____
TRIB. TO: _____

FISH KILL: Y N NO. NOTED? _____

CURRENT STATUS AT INCIDENT SCENE:

_____
_____
_____

OFFICIALS NOTIFIED (NAME / TITLE):

_____/_____ _____Am / pm

LOC. MUNIC. Phone Date Time

_____/_____ _____Am / pm

U.S. EPA Phone Date Time

_____/_____ _____Am / pm

OTHER Phone Date Time

IMMEDIATE PaDEP RESPONSE? Y N EMERGENCY? Y N ENFORCEMENT? Y N

CORRECTIVE ACTION INITIATED? Y N TIME _____ DATE _____

FINAL REPORT FORM FOR SPILL

DATE OF SPILL: _____ TIME OF SPILL: _____

OTHER SPILL IDENTIFICATION (TYPE OF SPILL, ESTIMATED VOLUME, ETC.):

_____

_____

BRIEF DESCRIPTION OF SPILL (FLOW SCHEMATIC OF SPILL, IF APPROPRIATE, EXPLANATION OF CAUSE OF SPILL):

_____

_____

_____

EFFECT ON THE P.O.T.W. (DOCUMENTATION OF PASS THROUGH, INTERFERENCE, AND DAMAGES TO THE P.O.T.W. AND ANY OTHER PROBLEMS RESULTING FROM THE SPILL):

_____

_____

_____

I.U. SPILL CONTROL PLAN EVALUATION AND REMEDIAL ACTION (SUMMARY OF EVALUATION, RESULTING MODIFICATIONS, AND COMPLIANCE SCHEDULES):

_____

_____

_____

ENFORCEMENT ACTION (FINES AND PENALTIES, LITIGATION FOR DAMAGES . . . IF APPLICABLE):

_____

_____

PRESENT STATUS (IN COMPLIANCE, CLEAN-UP EFFORT, P.O.T.W. OPERATIONS, ENFORCEMENT EFFORTS):

_____

_____

YUASA BATTERY, INC.
LAURELDALE, PA

SPILL PREVENTION/CONTROL PLAN

REVISION DATE: January 2009

YUASA BATTERY, INC.
2901 Montrose Ave
Laureldale, PA 19605
EPA ID # PAD095361655

SPILL PREVENTION/CONTROL PLAN

TABLE OF CONTENTS

SPILL PREVENTION/CONTROL PLAN
for
YUASA BATTERY, INC.

RECORD OF CHANGES

Revision	CHANGE DESCRIPTION	DATE ENTERED	POSTED BY
1		JANUARY 10, 1998	ALEX BANIAS
2		JANUARY 4, 1999	RICHARD BALDAUF
3		APRIL 19, 2001	JED WERNER
4		OCTOBER 16, 2002	JED WERNER
5	New Plan (EF-006-001)	APRIL 1, 2005	JED WERNER
6	update operation descriptions	OCTOBER 1,2005	JED WERNER
7	update emergency contacts	JANUARY 25, 2007	ROBIN DAUB
8	update plan	JANUARY 27, 2009	ROBIN DAUB

SPILL PREVENTION/CONTROL PLAN

I. Original Date of Plan: January 1995

II. Purpose

A. To comply with the requirements set forth in the EPA amended General Pretreatment Regulation in response to the Domestic Sewage Study. These amendments were published in the Federal Register on July 24, 1990. (40 CFR Parts 122 and 403.)

B. To establish procedures for the prevention/control/containment of hazardous waste or hazardous materials upon notification or discharge within the physical boundaries of Yuasa Battery's Laureldale facility.

C. Establish cleanup, disposal and restoration actions in the event of an actual spill or discharge at the facility.

This plan will be reviewed annually. It will be updated as needed or as changes occur in processing, materials used, etc. All locations receiving copies of this plan will receive any changes or updated copies.

IV. Location of Plan

Complete copies of this plan will be maintained at:

- Vice President of Operations
- Environmental Manager's Office
- Plant Engineer's Office
- Wastewater Treatment Plant
- Distribution Center Manager's Office
- Maintenance Supervisor Office
- And the following locations outside the plant:

1. **City of Reading**
Dept. of Public Works
815 Washington Street
Reading, PA 19601
Attn: Pretreatment Coordinator
610-655-6073

2. **Pennsylvania DEP**
1005 Cross Roads Blvd
Reading, PA 19605-9778
Attn: Office of Pollution Prevention
610-916-0100

3. **Elk Env. Services**
225 Warren Street
Reading, PA. 19601

610-372-4760

4. **Chief Mark George**
Temple Fire Co.
PO Box 217
Temple, PA 19560
610-929-8050

5. **Berks County Emergency Management Agency**
PO Box 520
Leesport, PA 19605

6. **Fire Chief**
David Feltenberger
Central Fire Company
Laureldale, PA 19605
610-929-9833

7. **Chief of Police**
Laureldale Police
3406 Kutztown Road
Laureldale, PA 19605
610-929-8816

8. **Chief Brian Kissinger**
Goodwill Fire Company
100 Madison Ave.
Reading, PA 19605
610-921-3393

V. Initial Emergency Contacts (YUASA)

TITLE	NAME	HOME PHONE CELL PHONE
FACILITY EMERGENCY COORDINATOR	Robin Daub	610-374-7228 610-301-5240
VICE PRESIDENT OF OPERATIONS	MIKE RAYBUCK	717-445-5322 717-368-3368

VI. General Description of Industrial/ Commercial Activity

Yuasa Battery's facility in Laureldale, PA is engaged in the manufacture and distribution of lead-acid storage batteries (NAICS 335). Acidic industrial wastewater from various plant production processes is collected and transferred to an on-site acid brick lined sump. The industrial wastewater is treated through the on site industrial wastewater treatment plant, and discharged to the City of Reading wastewater treatment plant (Industrial Wastewater Discharge Permit #35F). Solids collected in the Yuasa Battery, Inc. wastewater treatment plant are transported by contractors as listed on appendix F.

VII. Number of Employees

Yuasa Battery has a total of 172 employees at the Laureldale, PA facility. The shift-by-shift breakdown is as follows:

Day: 85 Plant Mid: 49 Plant Night: 38 Plant

VIII. Hours of Operation

Department operations occur on all three shifts, with some departments only work 2 shifts per day. The office staff's (approximately 31 people) normal hours are from 7:00 a.m. to 5:00 p.m. The remaining production shift starting times are staggered throughout the plant and are as follows:

1st shift begins between 5:00 a.m. and 5:50 a.m.
2nd shift begins between 1:00 p.m. and 1:50 p.m.
3rd shift begins between 9:00 p.m. and 9:50 p.m.

IX. Daily Discharge Rates

About 35,000 – 45,000 gallons per day are discharged to the sewer system through the industrial wastewater treatment plant. The rate varies depending on the shifts/departments in operation. The discharge to the sewer consists of toilet and urinal water, as well as a sink in the handicap bathroom.

Yuasa Battery's Permit 35F with the City of Reading P.O.T.W. calls for quarterly monitoring of total metals, PH, and oil grease in the system.

Locations of all restroom drains that discharge to the sewer systems are detailed in Appendix B of this plan.

Waste sulfuric acid from various plant manufacturing operations is collected in an acid brick lined sump and treated in the on site industrial wastewater treatment plant. The

wastewater treatment plant floor drains go back to the primary collection sump so the probability of spills is minor.

The storm water system is shown in Appendix C.

X. Security

All visitors to the Yuasa Battery facility are required to register prior to entry by signing a visitor sheet at the main entrance to the plant on Montrose Avenue. Appendix C illustrates the entry points to the facility.

External factors, such as power outages and strikes, will not result in adverse effects to human health or the environment as production processes and associated waste generation processes will cease. Adequate storage facilities for hazardous materials and wastes have been incorporated into facility design so as to allow short-term storage of such materials. Yuasa Battery provides its own internal security 24 hours a day.

Other external factors, such as floods and snowstorms, are not expected to produce adverse effects on public health and safety or the environment.

A topographic map (Appendix A) will illustrate other water supplies and structures in the general area of the facility.

XI. Inspection and Monitoring Program

Elements of the Yuasa Battery Hazardous waste facility inspection requirements are outlined below.

A. A RCRA 90-day facility Inspection Log shall be maintained for each hazardous waste storage area.

B. The frequency of inspection is as follows:

Hazardous waste containers storage areas: at least one inspection per week of areas where containers are stored, looking for leaking containers and the containment system caused by corrosion or other factors. The two locations are in the grid casting warehouse and a roll- off dumpster located behind the plant. There are satellite collection locations inside the plant to collect the hazardous waste.

XII. Employee Training Program

A. Indoctrination to Company Environmental policy

At the beginning of his/her employment, each employee is introduced to the Company's Environmental policy through the audio-visual presentation(s) and pamphlets. This indoctrination conducted by the environmental manager can be individualized or in small group instructions.

Each employee must understand the following concepts if he is to begin his work experience safely:

1. All aspects of Yuasa's Environmental Policy related to his or her position.
2. Plant management is committed to preventing accidents and reducing releases to the environment.
3. Each employee is expected to report to his supervisor any upset or noncompliance situations, which he encounters in his work.

B. Department Indoctrination and Training: When a new employee reaches his own department, his supervisor is responsible to give him additional safety training pertaining to the operation the employee is assigned, as well as complete instruction on his operation. The supervisor or foreman will explain the general safety rules of the department, machinery, or tool regulations, and personal protective equipment requirements.

Job instruction should be given in three parts:

1. Explain the job
2. Observe the worker on the job
3. Correct improper or unsafe work practices

The job explanation should include how to do the work both efficiently and safely. The supervisor or leader should then observe the new worker on his first day to insure the job is conducted properly. If corrections are needed, they should be demonstrated to the worker immediately so the improper behavior does not become habit.

A follow up of the worker's performance should be done by the supervisor within one week of the worker's start in the department to insure that the job is being carried out properly. The supervisor as well as all plant management must continually observe all employee practices to correct improper methods or unsafe acts before an accident occurs.

C. Introduction of new equipment and the training of employees

Whenever new equipment is added to the plant or changes in operation of present equipment occur, retraining of the workers is necessary. Plant management, including the Environmental, Health, and Safety manager, should be thoroughly familiar with the new process and plan the retraining of the employees and, if necessary, department supervision. No machinery shall be used unless all safety equipment is properly installed and all required ventilation is operable. Changes in existing machinery, which defeat safety or health protection devices, are also not to be permitted.

Training should begin with a brief introduction of the equipment or process. Special emphasis should be placed on procedures, which differ from present ones. All steps should be explained clearly. The instructor (plant supervisors or Environmental, Health, and Safety manager) should remember that his audience might not be as familiar as he is with the new process. Next, the workers operate the machinery or adopt the new procedure while under constant supervision. Any steps conducted improperly or unsafely should be corrected. Finally, plant supervision should periodically evaluate the new process and make any changes necessary to improve safety and performance. When giving instructions, one-word descriptions promote better comprehension as in "drop" or "burn." Demonstrating procedural steps as well as describing them in a word or two will help workers remember the sequence to follow (i.e., stack and burn.) Accidents occur when normal routine changes or a person is assigned to at new, especially a one-time, job. Plant management or department supervision should clearly explain and provide all the instruction necessary to complete this type of job safely.

XIII. Material Inventory

Potentially hazardous materials, their containers, and how they are stored are detailed in Appendix E. Lists of these materials with the proper Material Safety Data Sheets (MSDS) are located in each department with the Supervisor. Each department has a listing specific to that department. A "Right to Know" station is located at the main entrance to the plant and the departments. These lists are readily available to the employees through their Supervisor. A plant wide listing of the MSDS sheets is available with the EHS Department.

XIV. Hazardous Waste Inventory

An inventory of hazardous wastes generated at the Yuasa Battery, Laureldale, PA facility is presented in Appendix F. The inventory also includes the name of an approved facility to treat, store, or dispose of the waste, plus applicable U.S. Environmental Protection Agency (EPA) and U.S. Department of Transportation (DOT) shipping requirements.

XV. Plant Implementation in the Event of a Spill

In the event of a spill, the plant Emergency Coordinator is to be contacted immediately. If the spill occurs during non-routine hours, the appropriate plant management personnel shall be contacted using the emergency phone list (Appendix G)

A. Duties/Responsibilities of the Emergency Coordinator

The emergency coordinator upon notification will:

1. Assess the situation. Determine what level of response is necessary.

2. Direct resources to contain the spill.

3. Be thoroughly familiar with all aspects of the facility, this spill plan, the Potential Hazard Guides, all operations and activities at the facility, including characteristics of hazardous materials and waste handled.

4. The Company has authorized the emergency coordinator to commit the resources needed to carry out this spill plan. The company has an open purchase order on file with each primary spill cleanup company listed in order to carry out spill cleanup immediately.

5. Once the Emergency Coordinator is on-scene, he will brief the fire/hazardous materials team representative(s) on the hazard sources, amount, and facility layout including electrical panels and voltage inputs and/or outputs.

6. Whenever there has been an emission or discharge, fire, or explosion, the emergency coordinator shall assess possible hazards to human health or the environment that may have resulted. This assessment shall consider both direct and indirect effects on the emission, discharge, fire or explosion.

7. If the emergency coordinator determines that the facility has had an emission, discharge, fire or explosion, which could threaten human health or the environment, he shall accomplish the following:

   a. Immediately notify appropriate local authorities of his assessment. Assist appropriate officials in reaching a decision whether local area(s) should be evacuated.

   b. Immediately notify DEP by telephone.

8. Maintain an event log of actions taken during the incident.

9. Direct cleanup operations.

10. Insure restoration of environment to original condition.

11. If spill flows off-site, continue to assist local agencies in containment and cleanup.

NOTE: Emergency Response Procedures for specific situations are detailed in Appendix H.

B. Duties/Responsibilities of Outside Fire Department

Upon notification will:

1. Immediately respond to an actual or potential hazardous substance spill in accordance with established procedures.

2. Assist operations at the spill location with the assistance of the emergency coordinator.

3. Follow Emergency Response Guidebook (from DOT.)

4. If the facility stops operations in response to a fire, explosion, emission or discharge, the Incident Commander (or his representative) shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment.

C. Duties/Responsibilities of Local Police Department

Upon notification will:

1. Immediately respond to the hazardous substance spill area and isolate the area and control vehicle traffic when and where necessary in coordination with the Fire Department.

2. Keep all non-essential personnel and equipment out of the spill area.

3. Establish a security perimeter around the spill site.

D. Duties/Responsibilities of Yuasa Battery Inc.'s Vice President of Operations

Upon notification will:

1. Respond to all hazardous substance spills when requested by the emergency coordinator.

2. Keep abreast of all actions during a spill, fire, and/or explosion to provide prompt and accurate information on the nature of the incident and the steps being taken to correct the problem. This policy must be followed to obtain understanding of the public's concern and to ensure cooperation from all interested parties/agencies, as well as to check the spread of misinformation.

3. Clear all news releases involving the actions taking place with the President or his designated representative.

E. Duties / Responsibilities of Yuasa Battery Inc.'s Maintenance Supervisor:

1. Supervise building utility and production equipment shut-down as required.

2. Coordinate the safe start-up of plant utility and production equipment.

XVI. Additional Assistance During Implementation of Spill Plan

A. In the event that a release cannot be contained or cleaned up by Yuasa personnel, Yuasa Battery has contract with Elk Environmental Services, Reading, PA to provide Emergency Response Assistance, if required.

B. Sample Collection Procedures

The procedures to be used are as follows:

1. Use one (1) pint size glass container or suitable alternate container.

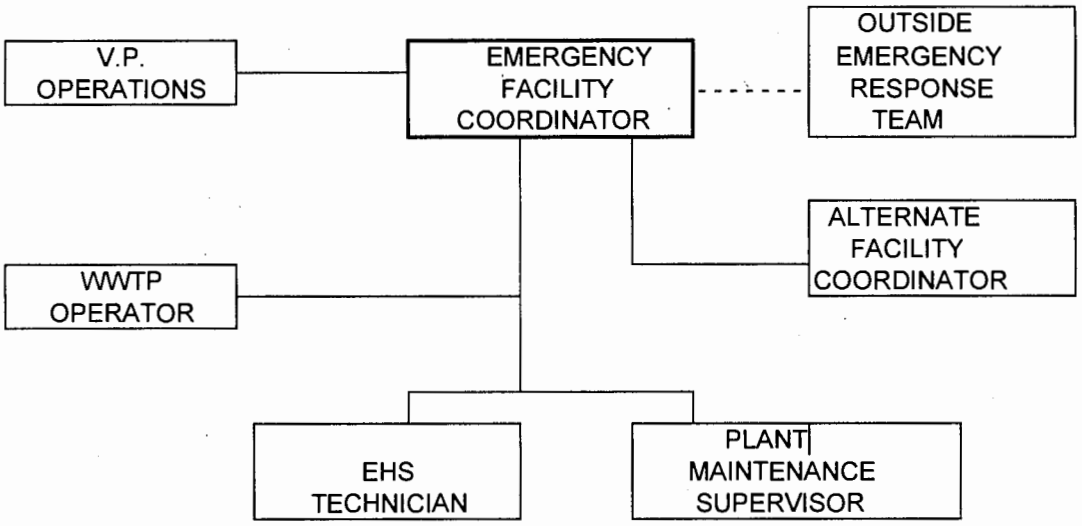
2. Use previously unused bottles or containers, which have been thoroughly cleaned with a strong detergent, thoroughly dried and rinsed.

3. Properly label samples to indicate location, time taken, and sequence of sampling.

4. Prepare a custody record stating the time and location of sample, name and title of individual taking the sample, and the name and title of each subsequent person handling the sample.

Note that plastic containers, with the exception of Teflon, have been found in some cases to absorb organic materials from water and in other cases hazardous substances have been found to dissolve plastic containers. Precautions must be taken to know the hazardous substances/wastes and their reaction on containers.

XVII. Chain of Command



XVIII. Emergency Contractor and Capability

Emergency Contractors	Capabilities
Primary Contractor:	
Elk Environmental Services 1420 Clarion Street Reading, PA 19601 EPA ID # PAD987271020 **TELE**: 610-372-4760	Spill Response Bulk Container

XIX. OUTSIDE EMERGENCY RESPONSE PHONE NUMBERS

ORGANIZATION	CONTACT/ LOCATION	PHONE NUMBER
FIRE DEPARTMENT	Central Fire Dept	**911**
AMBULANCE SERVICE	Muhlenberg	**911**
POLICE	Laureldale	(610)929-8816
EPA	Region 3	(215)814-9016
PADEP	Emergency Response	**1-800-975-9690**
PADEP	Reading District Office	(610)916-0100
PA. EMERGENCY MANAGEMENT AGENCY (PEMA)	Regional	(610)562-3003
LAURELDALE EMERGENCY MGMT COORDINATOR	Pat O'Brien	(610)929-4940 (Day) (610)921-9554 (Night)
HOSPITAL	Reading	(610)378-6000
MEDICL SERVICES	U.S. Healthworks	(610)926-0960
WASTEWATER TREATMENT PLANT	City of Reading	(610)655-6131 (day) (610)655-6300 (night)
DRINKING WATER	Muhlenberg Township Water Authority	(610)929-4709 (day) (610)929-2377 (night)
GPU ELECTRIC	Regional	1-800-545-7738 (24 hr)
HIGH VOLTAGE ELECTRIC SERVICE	Reuter &Hanney Warko	215-364-5333 610-796-4545
MG INDUSTRIES	N2 Gas Tank N2 Pipeline	1-800-641-4357 1-800-921-8608
POISON CONTROL	Berks County	1-800-722-7112

XX. Spill Alert and Prevention

Previous sections of this Spill Prevention Plan have dealt with procedures to be used in the event of a spill. Naturally, an even better course of action is to work toward preventing a spill at all.

Warning lights are present in two main locations. One is on the WWTP control panel. The warning light indicates that there is an out of spec. condition occurring in the WWTP. The other warning lights are located in the acid tower. The warning lights light up when there is either a leak or when there is an overfill of a tank. These warning lights light up light in the doorway on the southwest side of the acid tower in the Formation department. A manual alarm is located on each floor of the acid tower in the event of an emergency, which rings in the formation department.

Security Personnel provide security on 2nd and 3rd shift weekdays, and all shifts on weekends.

If an alarm does sound, or if security or other plant personnel detects a leak, notification can be made to plant and office personnel through the plant phone system. Actions will be taken from Appendix H. If an incident occurs during off duty hours, appropriate plant management is to is notified according the list identified in Appendix G. Evacuation from the plant can be made through the fire evacuation routes illustrated in Appendix D. If evacuation is deemed necessary, personnel are to move to the designated areas on the fire evacuation map. They are not to re-enter the plant until notified. In the event the facility is closed due to a spill, notification of return to work will be announced over local radio broadcast stations.

Spill supplies are located in the plant oil room next to the sulfuric acid/caustic soda delivery point. There is an inventory of hazardous spill pads, pillows and booms. There are also oil-only spill pads stored in the oil room. There are three hazardous material spill stations located throughout the plant.

Location of spill stations:

1.) Truck Driver entrance to D.C. next to dock 1.
2.) Paste Mixing.
3.) WWTP, under stairs to proceed to the top of the tanks.

XXI. Spill Incident History

The completed reports (copies) submitted following implementation of this Spill Plan shall be maintained on file at the facility and will become part of the facility's spill incident history.

A complete report will be issued to the City of Reading, Bureau of Wastewater Treatment within five (5) working days, along with any applicable photographs. The report is also to address precautions to be implemented to prevent a recurrence of the spill.

XXII. Certification

Based on my inquiry of the person(s) directly responsible for managing compliance with the measures in this Spill Prevention Plan, I certify that, to the best of my knowledge and belief, this facility is implementing this Spill Prevention Plan submitted to the City of Reading, Bureau of Wastewater Treatment.

_____

Signature

Mike Raybuck / Vice President - Operations January 28, 2009

Name / Title Date

I certify that the spill prevention and control equipment and procedures in place at this facility will provide adequate protection from spills when used and properly maintained.

_____

Signature

Robin S. Daub/Environmental, Health & Safety Manager January 28, 2009

Name / Title of Authorized Representative Date
Responsible for this Plan

Appendix A

Topo Map

Appendix B

Sanitary Sewer Discharge Points

Appendix C

1. Shutoffs
2. Storm Water Sewer Locations
3. Entry Points to Building

Appendix D

Emergency Evacuation Routes

APPENDIX E

PLANT LOCATION FOR LARGE VOLUME HAZARDOUS CHEMICALS

CHEMICAL	LOCATION	VOLUME	UN#	SOLID/LIQ/GAS
Acetylene	M	3 cylinders	1001	compr. Gas
Nitrogen (L)	F	11,000 gal	1977	liquid
Nitrogen (G)	M	3 cylinders	1066	compr. Gas
Oxygen (L)	L	1,500 gal	1073	liquid
Oxygen (G)	M	3 cylinders	1072	compr. Gas
Propane	N	12 cylinders	1075	compr. Gas
Paint	G	50 gal	1263	liquid//aerosol
Mineral Oil	E,D	150 gal	9277	liquid
Cleaning Solvent	G,J	100 gal	1268	liquid
Sulfuric Acid	B,C,D,I,J	10,000 gal	2796	liquid
Lead (L)	A			liquid
Lead (S)	Entire Plant			solid
Lead Acid Battery	I,J	2,000 units	2796	solid/liquid
Lead Battery - Dry	G,J	1 million		solid/liquid
Sodium Hydroxide	K	50,000 lb	1824	liquid

APPENDIX F

Hazardous Waste Inventory

Yuasa Battery, Inc.
HAZARDOUS WASTE INVENTORY
Generator: **Yuasa Battery, Inc.**
EPA Identification Number: **PAD095361655**

Hazardous Waste TSDF Information
Transporter: Elk Transportation, Inc.
EPA #: PAD987271020

Spent Material-Lead Contaminated Debris, Pallets, and DTC Sludge
DOT Hazard Class: N.O.S. 9
UN# or NA#: NA3077
RQ, NA 3077, Hazardous Waste Solid, n.o.s., 9, III Lead
TSDF: Max Environmental Technologies, Inc. (30 yard Rolloff)
Address: 233 Max Lane
Yukon, PA 15698
EPA ID#: PAD004835146

TSDF: Michigan Disposal Waste Treatment
Address: 49350 N. 1-94 Service Drive
Belleville, MI 48111
EPA ID#: MID00724831

Solvent Rags
DOT Hazard Class: N.O.S. 9
UN# or NA#: NA3077

TSDF: Giant Resource Recovery – Sumter, Inc.
Address: 755 Industrial Rd.
Sumter, SC 29150
EPA ID#: SCD036275626
RQ, UN1325, Waste Flammable Solids, Organic, n.o.s. (Toluene, Xylene), 4.1, II

Formation Sediment

TSDF: EQ Detroit, Inc.
Address: 1923 Frederick St.
Detroit, MI 48211
EPA ID#: MID980991566
DOT Hazard Class: N.O.S. 9
RQ, NA 3077, Hazardous Waste Solid, n.o.s., 9, III Lead

Current Packaging/Transport Vehicle: barrels, drums, roll-off (located on the east side of the building)

Requirements for EPA/DOT Hazardous Waste Compliance:

1. Hazardous waste manifest
2. Labels on containers: NA3077, Solid, N.O.S. 9

Reference: Section 172.202, 172.203; Federal Register Vol. 45, No. 101, May 22, 1980 and Federal Register Vol. 45, No. 219.

Generator: Yuasa Battery, Inc.
EPA Identification Number: PAD095361655

Treatment, Storage, Disposal Facility: Republic Env. Systems (PA), Inc.
EPA Identification Number: PAD085690592

General Waste Description: Solvent Rags
DOT Proper Shipping Name: Waste Flammable Solids, Organic, N.O.S.

DOT Hazard Class: 4.1
UN# or NA#: UN1325
EPA Hazardous Waste Number: D001, F003
Current Packaging/Transport Vehicle: drums

Requirements for EPA/DOT Hazardous Waste Compliance:

1. Hazardous waste manifest
2. Labels on containers: Flammable Solid

Reference: Section 172.202, 172.203; Federal Register Vol. 45, No. 101, May 22, 1980 and Federal Register Vol. 45, No. 219, November 10, 1980, Yuasa Battery, Inc. Preparedness, Prevention and Contingency Plan.

APPENDIX G

EMERGENCY CONTACT LIST
(Electrical Power Failure, Equipment Failure, Weather, etc.)
Updated 01/09/09

In the event of one of the above, the following personnel **must be called**.

Robin Daub – Environmental, Health & Safety Manager	Home:	610-374-7228
	Cell:	610-301-5240
Keith Ordemann – President & CEO	Home:	610-777-0812
	Cell:	610-223-4751
Pat Hojnacki – Vice President of Finance & Administration	Home:	610-793-3355
	Cell:	610-716-2815
Mike Raybuck – Plant Manager	Home:	717-445-5322
	Cell:	717-368-3368
Jim Colflesh – Director of Purchasing	Home:	610-926-2931
	Cell:	484-797-0178
Karen Fell – Human Resources Manager	Home:	610-689-4548
Brian Guzanowski – Distribution Center Manager	Home:	610-796-2674
	Cell:	484-802-2005
Faith DeLallo – IS Process & Support Specialist	Home:	610-777-6848
(Call if power outage in building)	Cell:	484-529-1849
Russ Reichert (Snow Removal – Sidewalks & building exits)	Home:	610-921-2701
	Cell:	610-698-2223
Scott Moyer – Down to Earth (Snow Removal - Parking Lots)	Home:	610-929-0913

In the event of a **WASTEWATER TREATMENT PLANT EMERGENCY** the following personnel **must be called**.

Dan Miller – Wastewater Treatment Operator	Cell:	610-842-1396
	Home:	610-926-4524 or 610-926-2811
Mark Richards – Backup Operator - Wastewater Treatment	Cell:	610-621-7689

In addition to the above list, it may be necessary to contact the following personnel:

Clay King – Quality Assurance Manager	Home:	610-939-9275

APPENDIX H

Emergency Response Procedures

Baghouse Fire
Acid/Caustic Unloading
Oxide Unloading
Diesel Fuel
Oil
Misc. Chemical Spill

Emergency Response Procedure for a fire in Baghouse #3

The Gridcasting baghouse #3 has an internal sprinkler system. If there are visible flames coming out of the baghouse stack and the sprinkler system has not been activated, ensure that the sprinkler system is turned on to the baghouse.

In the event of a fire and activation of the sprinkler system, the following steps need to be carried out.

1. Place (4) drain cover mats over the storm water drains next to baghouse #4. (Drain cover mats are stored in the oil room)
2. Lay hose in place and activate air diaphragm pump that collects water under the baghouse.
3. Do not turn off water to the sprinkler system when fire has been extinguished.
4. Pump water from storm drain covers into floor sump at Gridcasting chiller.
5. Collect all debris from inside collector in proper containers.

Notify Emergency Coordinator as soon as possible.

Emergency Response Procedure for spill of Sulfuric Acid or Sodium Hydroxide during unloading.

In the event of a spill during the unloading of sulfuric acid or sodium hydroxide all efforts are to be made to prevent the substance from entering the storm water collection basin, which is located north of baghouse # 2.

1. Any spilled product is to be cleaned up immediately using the pink absorbents product stored in the oil room.
2. The storm water drain covers are to be placed over the storm water grating if there is the possibility of product reaching it.
3. Absorbent pillows and socks are to be used to contain any spilled product to the smallest area of contamination possible.

Notify Emergency Coordinator as soon as possible.

Emergency Response Procedure for spill of Lead Oxide during unloading.

In the event of a spill of lead oxide all efforts are to be made to prevent the oxide from causing any further contamination

1. Small spills are to be cleaned up immediately using sweeping compound.
2. Large spills are to be contained to the smallest extent possible. Sweeping compound can be scattered over the oxide to prevent re-entrainment into the air, or plastic sheeting can be used to cover the oxide.
3. All material that is cleaned up is to be disposed of properly.

Contact Environmental Coordinator immediately when spill occurs.

Emergency Response Procedure for cleaning up Diesel fuel, hydraulic fluid or oil from tractor-trailers.

At the Distribution and manufacturing dock areas there are spill stations. These spill stations have absorbents to be used to prevent any fluids released from vehicles from mitigating offsite. All efforts are to be made to prevent fluids from entering storm water systems.

1. Contain the spill to the smallest area possible using absorbent materials.
2. Block off any storm water points from possible contamination.
3. Additional absorbent materials are available in the oil room. (White absorbents are oil only absorbents)
4. All material that is cleaned up is to be disposed of properly.

Contact Environmental Coordinator immediately when spill occurs.

Emergency Response clean up procedure for oil spills

Any oils that are spilled inside or outside the plant are to be cleaned up immediately.

1. Contain the spill to the smallest area possible using spill absorbent material.
2. Block off any storm water points from possible contamination.
3. Additional absorbent materials are available in the oil room. (White – oil only absorbents)
4. All material that is cleaned up is to be disposed of properly.

Emergency Response Procedures for clean up of Miscellaneous Chemical spills

Throughout the plant various chemicals are used in different departments. Spills can occur internally and externally of the plant. All spills are to be cleaned up immediately to lessen the impact to the environment.

1. Spills inside the plant are to be contained and cleaned up using absorbent materials or spill kits located throughout the plant. There are 2 universal spill kits in the plant; 1 in the D.C., and 1 in the hazardous waste room. There are 2 hazardous material spill kits; 1 in the wwtp, and 1 in paste mixing, and there are acid spill kits in the lab. A mercury spill kit is available in the Environmental office.

APPENDIX I

NOTIFICATION TO: Pennsylvania Department of Environmental Protection (PaDEP)

1-888-975-9690: 24-hour emergency response number
1-800-541-2050: If unable to reach above number, call here.

SPILL INCIDENT CHECKLIST

1. Name of Informant: _____
2. Name, address, & Identification # of facility: _____
3. Telephone number where informant can be reached: _____
4. Date of spill: _____
5. Time spill occurred: _____
6. Location of spill: _____
7. Brief description of the incident, type, nature, & hazards to the environment: _____
8. Extent of injuries: _____
9. Shipping name of waste: _____
10. Hazard Class: _____
11. U.N. number of waste: _____
12. Estimated quantity involved: _____
13. Time of notification: _____

APPENDIX J

NOTIFICATION TO: National Response Center
1-800-424-8802

SPILL INCIDENT CHECKLIST

1. Name of Informant: _____
2. Name, address, & Identification # of facility: _____
3. Telephone number where informant can be reached: _____
4. Date of spill: _____
5. Time spill occurred: _____
6. Location of spill: _____
7. Brief description of the incident, type, nature, & hazards to the environment: _____
8. Extent of injuries: _____
9. Shipping name of waste: _____
10. Hazard Class: _____
11. U.N. number of waste: _____
12. Estimated quantity involved: _____
13. Time of notification: _____

APPENDIX K

NOTIFICATION TO: City of Reading, Bureau of Wastewater Treatment
(610) 655-6083

SPILL INCIDENT CHECKLIST

1. Name of Informant: _____
2. Name, address, & Identification # of facility: _____
3. Telephone number where informant can be reached: _____
4. Notification received by (P.O.T.W.): _____
5. Date of spill: _____
6. Location of spill: _____
7. Brief description of the incident, type, nature, & hazards to the environment: _____
8. Personnel safety concerns: _____
9. Extent of injuries: _____
10. Containment in place: _____
11. Current response efforts: _____
12. Hazard Class: _____
13. U.N./N.A. # of waste: _____
14. Estimated quantity involved: _____
15. Time of notification: _____

APPENDIX L

1. Log of Key Events of the Spill

2. Spill Response Report

3. Final Report Form for Spill

LOG OF KEY EVENTS OF THE SPILL

On site, in collection system, in community, and P.O.T.W., include the date, time, and action for each spill.

DATE OF SPILL: _____

TIME OF SPILL: _____

NOTIFICATION: _____

_____

_____

RESPONSE EFFORTS: _____

_____

_____

CONTROL EFFORTS: _____

_____

_____

CONTAINMENT TREATMENT EFFORTS: _____

_____

_____

DISPOSAL: _____

_____

_____

REMEDIAL ACTIONS: _____

_____

_____

SPILL RESPONSE REPORT

NATURE OF INCIDENT: Complaint Munic. Notification Emergency other

DATE: _____ TIME: _____ a.m. / p.m.
REC'D BY: _____

INCIDENT REPORTED BY: _____

TITLE/AFFIL. _____
PHONE: _____

ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____

INCIDENT LOCATION: Transportation Facility other

NAME (SITE): _____
PHONE: _____

ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____

COUNTY: _____
TWSP. /BORO: _____

DATE OF INCIDENT OCCURRENCE: _____
TIME: _____ a.m. / p.m.

RESPONSIBLE PARTY: ÿ Known ÿ Unknown ÿ Suspected

NAME: _____ PHONE: _____

ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____

Contact: _____ Title: _____
Phone: _____

IDENTITY OF SUBSTANCE RELEASED: Known Unknown Suspected

SUBSTANCE: _____ Gas Liquid Solid Hazardous

CAS # _____ UN # _____
DOT # _____

AMT. RELEASED/SPILLED: _____ lb / g / cu ft Actual Potential Undetermined

SUBSTANCE CONTAINED? Yes No Undetermined

CLEAN-UP CONTRACTOR: _____
PHONE: _____

TYPE OF RELEASE/SPILL: Terminated Continuous Intermittent

HAZARD EVALUATION: Fire Hazard Explosive Fumes Corrosive

PERSONNEL SAFETY CONCERNS

EXPOSURE:

_____
_____

STRUCTURAL DANGER:

_____
_____

COMMENTS:

_____
_____

INCIDENT DESCRIPTION:

Fire Explosion Air Release Spill Smoke/Dust

Odors Other _____

Equipment Start-up/Shutdown/Failure/Etc.
Other _____

INJURIES? Y N U PUBLIC EXPOSURE? Y N U

FACILITY EVALUATION? Y N U POLICE AT SCENE? Y N U

POTABLE WATER SOURCE? Y N U ASSISTANCE REQUESTED? Y N U

CONTAMINATION OF: AIR SOIL SURFACE WATER GROUND WATER

RECEIVING WATER: _____
TRIB. TO: _____

FISH KILL: Y N NO. NOTED? _____

CURRENT STATUS AT INCIDENT SCENE:

_____
_____
_____

OFFICIALS NOTIFIED (NAME / TITLE):

_____/_____ _____Am / pm

LOC. MUNIC. Phone Date Time

_____/_____ _____Am / pm

U.S. EPA Phone Date Time

_____/_____ _____Am / pm

OTHER Phone Date Time

IMMEDIATE PaDEP RESPONSE? Y N EMERGENCY? Y N ENFORCEMENT? Y N

CORRECTIVE ACTION INITIATED? Y N TIME _____ DATE _____

FINAL REPORT FORM FOR SPILL

DATE OF SPILL: _____ TIME OF SPILL: _____

OTHER SPILL IDENTIFICATION (TYPE OF SPILL, ESTIMATED VOLUME, ETC.):

_____

_____

BRIEF DESCRIPTION OF SPILL (FLOW SCHEMATIC OF SPILL, IF APPROPRIATE, EXPLANATION OF CAUSE OF SPILL):

_____

_____

_____

EFFECT ON THE P.O.T.W. (DOCUMENTATION OF PASS THROUGH, INTERFERENCE, AND DAMAGES TO THE P.O.T.W. AND ANY OTHER PROBLEMS RESULTING FROM THE SPILL):

_____

_____

_____

I.U. SPILL CONTROL PLAN EVALUATION AND REMEDIAL ACTION (SUMMARY OF EVALUATION, RESULTING MODIFICATIONS, AND COMPLIANCE SCHEDULES):

_____

_____

_____

ENFORCEMENT ACTION (FINES AND PENALTIES, LITIGATION FOR DAMAGES . . . IF APPLICABLE):

_____

_____

PRESENT STATUS (IN COMPLIANCE, CLEAN-UP EFFORT, P.O.T.W. OPERATIONS, ENFORCEMENT EFFORTS):

_____

_____